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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

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In the Matter of)

Revision of the Commission's Rules to)
Ensure Compatibility With Enhanced 911)
Emergency Calling Systems)

CC Docket No. 94-102

Amendment of Parts 2 and 25 to)
Implement the Global Mobile Personal)
Communications by Satellite (GMPCS))
Memorandum of Understanding and)
Arrangements; Petition of the National)
Telecommunications and Information)
Administration to Amend Part 25 of the)
Commission's Rules to Establish)
Emission Limits for Mobile and Portable)
Earth Stations Operating in the)
1610-1660.5 MHz Band)

IB Docket No. 99-67

To: Chief, International Bureau

**MSS 911 EMERGENCY CALL CENTER PRE-IMPLEMENTATION REPORT OF
STRATOS MOBILE NETWORKS, INC. AND
STRATOS COMMUNICATIONS, INC.**

As required by the Commission's Second Report and Order in the above-captioned proceeding, Stratos Mobile Networks, Inc. and Stratos Communications, Inc. and their affiliates (collectively, "Stratos") are pleased to present this MSS 911 emergency call center pre-implementation report.

Stratos is a public company (TSE:SGB) specializing in mobile and fixed remote communications solutions for government, enterprise, and individual customers operating beyond the reach of traditional terrestrial telecommunications. The

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company is a vertically integrated satellite and microwave global service provider that owns and operates its own telecommunications facilities, shares infrastructure with other carriers, and distributes the services of other network operators.

Stratos' portfolio of mobile satellite services includes Inmarsat, MarineSat/LandSat MSV, Iridium, and Globalstar. It is Stratos' intent to offer the MSS 911 capability to those specific services and terminals that are subject to the MSS 911 requirements and for which Stratos is the facilities based carrier. For those mobile satellite services where Stratos is a non-facilities based reseller, Stratos' obligation will be to ensure access to 911 service to the extent that the underlying facilities-based licensee offers access to 911 service.

The distribution of Stratos services is through 300+ authorized dealers around the world. In addition, Stratos maintains a direct sales force which focuses on larger accounts requiring a solution sale, including VSAT (very small aperture terminal) data network services, government contracts and turnkey oil and gas projects.

The markets that Stratos serves include Oil and Gas, Government/Military, Shipping, Commercial Fishing, Broadcast/Media, Aeronautical, Energy, Mining, Cruise, Engineering/Consulting, Yachting, Rural Communications, Humanitarian/Disaster Relief, Resource Exploration, and Recreational Users.

Stratos' Identification Information

Corporate Headquarters:

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Filer of Pre-Implementation Status Report and Contact Person on 911 Issues:

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Description of Stratos' Coverage Area

Stratos' coverage area is global and includes all of the United States and its territories.

Basic Call Center Information Including Location and Plans for Routing Emergency Calls to PSAPs

Stratos operates a global call center located in St. John's, Newfoundland, Canada that is staffed 24x7, 365 days per year. All 911 emergency calls from Stratos customers will be routed to this call center via our normal mobile to fixed call routing. Because of the way these calls are routed, internally within the Stratos network, they are never handled within the public switch telephone network prior to being answered by a Stratos Call Center employee. 911 calls will be clearly identified within the Stratos telephone system and assigned a higher priority than all other call types received in the center. This will ensure that these calls are handled in a priority manner.

Upon answering the inbound call, Stratos staff will attempt to determine the geographic location of the caller and the nature of the emergency, if any. Using commercially available software (PSAP Pro TM from MapInfo [®]), Stratos staff will determine the applicable PSAP to which to route the emergency call. Stratos staff will stay on the line until they can confirm that the caller is in contact with the PSAP at which point they will disconnect from the call.

Once disconnected Stratos staff will create a record of the call in the CRM software currently in use and include details such as caller identification, date and time of call, and the PSAP to which the call was routed. These entries will be used to compile the required statistical reports to be filed with the Commission.

Description of How Stratos' Call Center Features Will Be Communicated to Customers

The description of the call center services will be communicated to Stratos' customers in two ways.

First, notification and a description of the service will be posted to Stratos' publically accessible website at www.stratosglobal.com beginning November 1, 2004.

Second, notification of the service will be included in all invoices sent to customers in November and December 2004 and again in January 2005. This invoice notification will inform customers that the service will be available

commencing February 11, 2005 and direct the customer base to the Stratos Global website for further details.

Problems that Stratos Has Experienced in Organizing Its Call Center

To date, Stratos has encountered no significant problems in setting up its call center activity pursuant to the FCC Second Report and Order. However, Stratos has found limited availability of commercially available software that allows carriers to access nationwide PSAP contact information and experienced difficulty in ensuring that updates to the information contained in this software is timely and accurate.

Conclusion

Any questions related to this report should be directed to the undersigned at the contact details listed below.

Best regards,

A handwritten signature in black ink that reads "Brian Marsh". The signature is written in a cursive, flowing style.

Brian Marsh
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October 12, 2004

cc: Marlene H. Dortch, Secretary